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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MINNESOTA**

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**PLACEHOLDER FOR  
EXHIBIT 20 TO DECLARATION OF  
GENEVIEVE M. ZIMMERMAN**

In re: Bair Hugger Forced Air Warming  
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

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This document is a place holder for the following item(s) which are filed in conventional or physical form with the Clerk's Office:

*Exhibit 20 – Document beginning at Bates Number 3MBH00024633*

If you are a participant in this case, this filing will be served upon you in conventional format.

This filing was not e-filed for the following reason(s):

☐ Voluminous Document\* (Document number of order granting leave to file conventionally: ☐ )

☐ Unable to Scan Documents (e.g., PDF file size of one page larger than 15MB, illegible when scanned)

☐ Physical Object (description):

☐ Non Graphical/Textual Computer File (audio, video, etc.) on CD or other media

☒ Item Under Seal pursuant to a court order\* (Document number of protective order: 39 )

☐ Item Under Seal pursuant to the Fed. R. Civ. P. 5.2 and Fed. R. Crim. P. 49.1  
(Document number of redacted version: ☐ )

☐ Other (description):

\* Filing of these items requires Judicial Approval.

E-file this place holder in ECF in place of the documents filed conventionally. File a copy of this Placeholder and a copy of the NEF with the Clerk's Office along with the conventionally filed item(s).